

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI**

**IN RE: HELEN W. HOLDEN  
DEBTOR**

**CASE NO: 22-12578  
CHAPTER 13**

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**OBJECTION TO CONFIRMATION**

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**COMES NOW** Kristal Savage and files this Objection to Confirmation of Chapter 13 Plan and states as follows:

1. The proposed plan provides for the assumption of a residential lease with Kristal Savage ("Ms. Savage"). The plan further provides that the debtor will pay the current installment payments of \$1,950.00 per month directly to Ms. Savage and the arrearage of \$3,595.00 will be paid through the plan.

2. Ms. Savage objects to the proposed plan for the following reasons.

3. First, the plan does not state in what method those payments will be made. Ms. Savage requests those payments be made by either cashier's check or money order.

4. Second, the arrearage amount listed in the plan is incorrect. A proof of claim has been filed with the correct amount.

5. Third, the lease term ends on February 28, 2023. The plan does not state the debtor's intent for when the lease ends. Ms. Savage requests the plan

**WHEREFORE**, Ms. Savage prays that the Court sustain this objection and the confirmation of the proposed chapter 13 plan be denied.

**RESPECTFULLY** submitted, this the 24<sup>th</sup> day of October, 2022.

\_\_\_\_\_/s/William L. Fava\_\_\_\_\_

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Attorney for Kristal Savage

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**CERTIFICATE OF SERVICE**

I, William L. Fava, attorney for the above listed creditor, do hereby certify that I have this day mailed a true and correct copy of the above Objection to Confirmation to the following:

Locke D. Barkley  
Via ECF at [sbeasley@barkley13.com](mailto:sbeasley@barkley13.com)

U.S. Trustee  
Via ECF at [USTPRegion05.AB.ECF@usdoj.gov](mailto:USTPRegion05.AB.ECF@usdoj.gov)

Attorney for Debtor – Via ECF

DATED: October 24, 2022

/s/William L. Fava  
WILLIAM L. FAVA  
Attorney for Debtors

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